

1 ROBERT J. PARKS (CA Bar No. 103014)
2 robert.parks@bipc.com
3 ROBERT K. EDMUNDS (CA Bar No. 89477)
4 robert.edmunds@bipc.com
5 RACHEL E. WATERS
6 rachel.waters@bipc.com
7 BUCHANAN INGERSOLL & ROONEY LLP
8 One America Plaza
9 600 West Broadway, Suite 1100
10 San Diego, CA 92101
11 Telephone: 619 239 8700
12 Fax: 619 702 3898

13 Attorneys for Defendant,
14 CUMBERLAND PACKING CORP. and JEM PARTNERS, LLC

15 UNITED STATES BANKRUPTCY COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 SAN FERNANDO VALLEY DIVISION

18 In re:

19 KSL MEDIA, INC., *et al.*

20 Debtors.

21 vs.

- 22 Affects KSL Media, Inc.
23 Affects T.V. 10's, LLC
24 Affects Fulcrum 5, Inc.
25 Affects All Debtors.

26 DAVID K. GOTTLIEB, as Chapter 7 Trustee
27 for KSL Media, Inc.; DAVID K. GOTTLIEB,
28 as Chapter 7 Trustee for T.V. 10's, LLC; and
DAVID K. GOTTLIEB, as Chapter 7 Trustee
for Fulcrum 5, Inc.,

Plaintiffs,

29 vs.
30 CUMBERLAND PACKING CORP., a New
31 York corporation; JEM PARTNERS, LLC, a
32 New York limited liability company,

33 Defendants.

34 Case No. 1:13-bk-15929-AA

35 [Jointly Administered with Case Nos."
36 1:13-bk-15930-AA and 1:13-bk-15931-AA]

37 Chapter 7

38 Adv. No. 1:14-ap-01059-AA

39 **NOTICE OF WITHDRAWAL OF
40 DEFENDANT CUMBERLAND PACKING
41 CORP.'S AND DEFENDANT JEM
42 PARTNERS, LLC'S MOTION FOR MORE
43 DEFINITE STATEMENT (Dkt No. 6) AND
44 AMENDED MOTION FOR MORE
45 DEFINITE STATEMENT (Dkt. No. 10)**

46 Hearing Date: July 2, 2014

47 Time: 11:00 a.m.

48 Judge: Hon. Alan Ahart

49 Location: San Fernando Valley
50 21041 Burbank Boulevard
51 Woodland Hills, CA 91367

52 Courtroom: 303

1 Defendants Cumberland Packing Corp. and JEM Partners, LLC (collectively, the
2 "Defendants"), by and through their counsel, now withdraw their Notice of Motion and Motion for
3 More Definite Statement Pursuant to Federal Rule of Civil Procedure 12(e) and Amended Notice of
4 Motion and Motion for More Definite Statement Pursuant to Federal Rule of Civil Procedure 12(e)
5 filed as Docket Nos. 6 and 10 respectively (the "Motion"), and dated April 28, 2014. Pursuant to
6 Local Bankruptcy Rule 9013-1(k) Defendants have provided telephonic notice of the withdrawal of
7 the Motion to opposing counsel and to Judge Alan Ahart's courtroom deputy. Defendants
8 respectfully request that the hearing on the Motion currently set for July 2, 2014 at 11:00 a.m. be
9 taken off of the Court's calendar.

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DATED: June 27, 2014

BUCHANAN INGERSOLL & ROONEY LLP

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By:



ROBERT J. PARKS
ROBERT K. EDMUNDS
RACHEL E. WATERS
Attorneys for Defendant,
CUMBERLAND PACKING CORP. and JEM
PARTNERS, LLC

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 600 W. Broadway, Suite 1100, San Diego, CA 92101

A true and correct copy of the foregoing document entitled (specify): **1) NOTICE OF WITHDRAWAL OF DEFENDANT CUMBERLAND PACKING CORP.'S AND DEFENDANT JEM PARTNERS, LLC'S MOTION FOR MORE DEFINITE STATEMENT (DKT NO. 6) AND AMENDED MOTION FOR MORE DEFINITE STATEMENT (DKT. NO. 10)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 27, 2014**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Steven J. Kahn, skahn@pszyjw.com
David Gottlieb (TR), dkgtrustee@crowehorwath.com
United States Trustee (SV), ustpregion16.wh.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **June 27, 2014**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Judge Alan M. Ahart, United States Bankruptcy Court, 20141 Burbank Boulevard, Suite 342, Rm. 303, Woodland Hills, CA 91367 (**via overnight mail**)

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

6/27/14

ROBIN ROBBINS

Date

Printed Name

/s/ Robin Robbins

Signature